Statement of Basis of the Federal Operating Permit

Equistar Chemicals, LP

Site Name: Equistar Chemicals Matagorda Plant
Area Name: Matagorda Plant Plastics Manufacturing
Physical Location: 17042 State Highway 60 South
Nearest City: Bay City
County: Matagorda

Permit Number: O1635
Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 325211
NAICS Name: Plastics Material and Resin Manufacturing

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;
A basis for applying permit shields;
A list of the federal regulatory applicability determinations;
A table listing the determination of applicable requirements;
A list of the New Source Review Requirements;
The rationale for periodic monitoring methods selected;
The rationale for compliance assurance methods selected;
A compliance status; and
A list of available unit attribute forms.

Prepared on: July 11, 2019

Operating Permit
Basis of Determination

Permit Area Process Description
The primary product of the Equistar Matagorda Plant is High Density Polyethylene (HDPE) through the polymerization of ethylene in the presence of catalysts. The four main sections in the process are raw materials preparation, polymerization reaction process, product finishing and storage process, and the material recovery process.

Raw Materials Preparation Process Section - The catalyst components are stored in tanks until they are needed to create the catalysts used in the polymerization reaction. Diluted catalysts and catalyst activator are stored and fed into the polymerization reactors as they are needed. The crude hexane is preheated and sent through a hexane refining column which has the light-end products of ethylene and hydrogen and the heavy-end products of n-hexane and wax. The light-end products are cooled down; the remaining gases in the mixture are sent to the fuel gas system and the liquids are refluxed through the column. The heavy-end product is sent to another distillation column that separates the n-hexane and wax; both of the purified products from this second column are sent to storage tanks.

Polymerization Reaction Process Section - This section is separated into four process trains that all have similar functions and all four trains are capable of producing all standard grades of HDPE. The following applies to all four process trains. Ethylene, hydrogen, n-hexane, and (when producing co-polymer grade HDPE) co-monomer are combined and fed into the reactor. Catalyst from storage is activated, mixed with toluene, and introduced into the reactor. The formed polymer slurry flows from the reactor to a flash drum, where unreacted ethylene, hydrogen, and co-monomer are flashed, cooled, and recycled with use of a compressor. Vapors from the reactor are cooled and flow into the fuel gas system.

Product Finishing and Storage Process Section - Polyethylene slurry from the flash drum is pumped to the slurry drum before being pumped to the centrifuge. The centrifuge filtrate is either recycled back to the reactors or is combined with the filtrate from the other process trains, routes through the solvent recovery process, and then pumped to the crude hexane storage facilities. Centrifuged polyethylene wet cake is conveyed to the dryer which dries the formed polyethylene. The dried polyethylene, or polyethylene powder, is then nitrogen-conveyed to the compounding and pelletizing sections. The powder is gravity fed to the powder blenders and then into the continuous mixer feed hoppers. The powder and additives then flow into the continuous mixers, which mix and melt the polyethylene and additives together to form HDPE. The HDPE is then pelletized and then dried. The resulting pellets are sent to blend silos with air, and then sent to the product storage or loadout silos.

Material Recovery Process Section - Hexane is recovered from the catalyst preparation and product finishing centrifuge areas, and is mixed with the bottom stream from the crude hexane refining column. This mixed stream, containing heavy-end components, such as n-hexane and wax, is fed to another column where the n-hexane and wax are separated and sent to respective storage areas.

FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, HAPS

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
    - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
    - Additional Monitoring Requirements
    - New Source Review Authorization Requirements
    - Compliance Requirements
    - Protection of Stratosphere Ozone
    - Permit Location
    - Permit Shield (30 TAC § 122.148)
- Attachments
    - Applicable Requirements Summary
        - Unit Summary
        - Applicable Requirements Summary
    - Additional Monitoring Requirements
    - Permit Shield
    - New Source Review Authorization References
    - Compliance Plan
    - Alternative Requirements
- Appendix A
    - Acronym list
- Appendix B
    - Copies of major NSR authorizations

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No

Regulatory Program	Applicability (Yes/No)
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO_2 Trading Program)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.

15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled “Basis for Applying Permit Shields” specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
EG701	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-2	HAP Source = The site is a major source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii). Stationary RICE Type = Compression ignition engine	
GEN-1	40 CFR Part 60, Subpart IIII	60IIII-1	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005. Diesel = Diesel fuel is used. Kilowatts = Power rating is greater than or equal to 75 KW and less than 130 KW. Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement. Filter = The CI ICE is not equipped with a diesel particulate filter. Displacement = Displacement is less than 10 liters per cylinder and engine is a constant-speed engine. Service = CI ICE is a non-emergency engine. Standards = The emergency CI ICE meets the standards applicable to non-emergency engines. Commencing = CI ICE was newly constructed after 07/11/2005. Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions. Manufacture Date = Date of manufacture was after 04/01/2006. Model Year = CI ICE was manufactured in model year 2011.	
GEN-1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-3	HAP Source = The site is a major source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006. Service Type = Limited use.	
GEN-2	40 CFR Part 60, Subpart IIII	60IIII-1	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005. Diesel = Diesel fuel is used. Kilowatts = Power rating is greater than or equal to 75 KW and less than 130 KW. Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement. Filter = The CI ICE is not equipped with a diesel particulate filter. Displacement = Displacement is less than 10 liters per cylinder and engine is a constant-speed engine. Service = CI ICE is a non-emergency engine. Standards = The emergency CI ICE meets the standards applicable to non-emergency engines.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Commencing = CI ICE was newly constructed after 07/11/2005. Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions. Manufacture Date = Date of manufacture was after 04/01/2006. Model Year = CI ICE was manufactured in model year 2011.	
GEN-2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-3	HAP Source = The site is a major source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006. Service Type = Limited use.	
HYDROENG	40 CFR Part 60, Subpart JJJJ	60JJJJ-001	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
P741B	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-2	HAP Source = The site is a major source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction on or after December 19, 2002, but before June 12, 2006. Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii). Stationary RICE Type = Compression ignition engine	
P741C	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-2	HAP Source = The site is a major source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction on or after December 19, 2002, but before June 12, 2006. Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii). Stationary RICE Type = Compression ignition engine	
DIESEL 1	30 TAC Chapter 115, Storage of VOCs	R5112-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Construction Date = On or after May 12, 1973 Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.5 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
DIESEL 2	30 TAC Chapter 115, Storage of VOCs	R5112-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	
HT-171	30 TAC Chapter 115, Storage of VOCs	R5112-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Construction Date = On or after May 12, 1973 Tank Description = Tank using an internal floating roof with slotted sampling and gauge pipes Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.5 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
HT-171	40 CFR Part 60, Subpart Ka	60KA-2	Product Stored = Stored product other than a petroleum liquid	
HT-171	40 CFR Part 63, Subpart FFFF	63FFFF-TK1	Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i. WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1). Notification = The referencing subpart does not require notification of initial startup. Unslotted Guide Pole = The tank does not use an unslotted guide pole. Wiper or Seal = The unslotted guide pole is equipped with a pole wiper and a pole sleeve. Seal Configuration = Vapor-mounted seal.	
HT-601	30 TAC Chapter 115, Storage of VOCs	R5112-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof with slotted sampling and gauge pipes Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia Storage Capacity = Capacity is greater than 25,000 gallons	
HT-601	40 CFR Part 60, Subpart Ka	60KA-2	Product Stored = Stored product other than a petroleum liquid	
HT-601	40 CFR Part 63, Subpart FFFF	63FFFF-TK1	Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i. WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1). Notification = The referencing subpart does not require notification of initial startup. Unslotted Guide Pole = The tank does not use an unslotted guide pole. Wiper or Seal = The unslotted guide pole is equipped with a pole wiper and a pole sleeve.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Seal Configuration = Vapor-mounted seal.	
HT-602	30 TAC Chapter 115, Storage of VOCs	R5112-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof with slotted sampling and gauge pipes Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia Storage Capacity = Capacity is greater than 25,000 gallons	
HT-602	40 CFR Part 60, Subpart Ka	60KA-2	Product Stored = Stored product other than a petroleum liquid	
HT-602	40 CFR Part 63, Subpart FFFF	63FFFF-TK1	Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i. WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1). Notification = The referencing subpart does not require notification of initial startup. Unslotted Guide Pole = The tank does not use an unslotted guide pole. Wiper or Seal = The unslotted guide pole is equipped with a pole wiper and a pole sleeve. Seal Configuration = Vapor-mounted seal.	
HT-606	30 TAC Chapter 115, Storage of VOCs	R5112-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof with slotted sampling and gauge pipes Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia Storage Capacity = Capacity is greater than 25,000 gallons	
HT-606	40 CFR Part 60, Subpart Ka	60KA-2	Product Stored = Stored product other than a petroleum liquid	
HT-606	40 CFR Part 63, Subpart FFFF	63FFFF-TK1	Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i. WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1). Notification = The referencing subpart does not require notification of initial startup. Unslotted Guide Pole = The tank does not use an unslotted guide pole. Wiper or Seal = The unslotted guide pole is equipped with a pole wiper and a pole sleeve. Seal Configuration = Vapor-mounted seal.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
HT-608	30 TAC Chapter 115, Storage of VOCs	R5112-6	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Construction Date = On or after May 12, 1973 Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.5 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
HT-608	40 CFR Part 60, Subpart Ka	60KA-2	Product Stored = Stored product other than a petroleum liquid	
HT-735	30 TAC Chapter 115, Storage of VOCs	R5112-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof with slotted sampling and gauge pipes Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia Storage Capacity = Capacity is greater than 25,000 gallons	
HT-735	40 CFR Part 60, Subpart Ka	60KA-3	Product Stored = Stored product other than a petroleum liquid	
HT-735	40 CFR Part 63, Subpart FFFF	63FFFF-TK1	Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i. WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1). Notification = The referencing subpart does not require notification of initial startup. Unslotted Guide Pole = The tank does not use an unslotted guide pole. Wiper or Seal = The unslotted guide pole is equipped with a pole wiper and a pole sleeve. Seal Configuration = Vapor-mounted seal.	
HT-793	40 CFR Part 60, Subpart Ka	60KA-1	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less	
HT-794	40 CFR Part 60, Subpart Ka	60KA-1	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less	
HT-797	30 TAC Chapter 115, Storage of VOCs	R5112-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
HT-797	40 CFR Part 60, Subpart Ka	60KA-1	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less	
HT-798	30 TAC Chapter 115, Storage of VOCs	R5112-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	
HT-798	40 CFR Part 60, Subpart Ka	60KA-1	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less	
HT-799	30 TAC Chapter 115, Storage of VOCs	R5112-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons	
HT-799	40 CFR Part 60, Subpart Ka	60KA-1	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less	
HT-801	30 TAC Chapter 115, Storage of VOCs	R5112-4	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Construction Date = On or after May 12, 1973 Tank Description = Tank using a submerged fill pipe Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
HT-801	40 CFR Part 60, Subpart Ka	60KA-1	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less	
HV-305	30 TAC Chapter 115, Storage of VOCs	R5112-6	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Construction Date = On or after May 12, 1973 Tank Description = Tank does not require emission controls Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is less than 1.5 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
HV-305	40 CFR Part 60, Subpart Ka	60KA-2	Product Stored = Stored product other than a petroleum liquid	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
V-795	30 TAC Chapter 115, Storage of VOCs	R5112-5	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Construction Date = On or after May 12, 1973 Tank Description = Tank using a vapor recovery system (VRS) Product Stored = VOC other than crude oil or condensate True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Control Device Type = Flare	
V-795	40 CFR Part 60, Subpart Ka	60KA-2	Product Stored = Stored product other than a petroleum liquid	
V-795	40 CFR Part 63, Subpart FFFF	63FFFF-TK2	Designated HAL = The emission stream is not designated as halogenated. Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii. Determined HAL = The emission stream is determined not to be halogenated. Prior Eval = The data from a prior evaluation or assessment is used. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = No bypass lines.	
L-737	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia. Daily Throughput = Loading less than 20,000 gallons per day.	
L-737	40 CFR Part 63, Subpart FFFF	63FFFF-1	Emission Standard = A flare is being used per § 63.2475(a) - Table 5.1.b. Designated Hal = The emission stream is not designated as halogenated. Determined Hal = The emission stream is determined to be nonhalogenated. Prior Eval = The data from a prior evaluation or assessment is used. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = No bypass lines.	
L-740	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia. Daily Throughput = Loading less than 20,000 gallons per day.	
L-740	40 CFR Part 63, Subpart FFFF	63FFFF-1	Emission Standard = A flare is being used per § 63.2475(a) - Table 5.1.b. Designated Hal = The emission stream is not designated as halogenated. Determined Hal = The emission stream is determined to be nonhalogenated. Prior Eval = The data from a prior evaluation or assessment is used. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = No bypass lines.	
GRP-BOILER	30 TAC Chapter 112, Sulfur Compounds	REG2-1	Fuel Type = Liquid fuel. Heat Input = Design heat input is less than or equal to 250 MMBtu/hr. Stack Height = The effective stack height is at least the standard effective stack height for each stack to which the unit routes emissions.	
GRP-BOILER	40 CFR Part 60, Subpart Dc	60DC-1	Construction/Modification Date = On or before June 9, 1989.	
GRP-BOILER	40 CFR Part 63, Subpart DDDDD	63DDDDD-1	Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010.	
MAINT-BOILER	40 CFR Part 60, Subpart Dc	60DC-1	Construction/Modification Date = On or before June 9, 1989.	
MAINT-BOILER	40 CFR Part 63, Subpart DDDDD	63DDDDD-002	Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010.	
GRP-FLARE	30 TAC Chapter 111, Visible Emissions	R1111-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.	
GRP-FLARE	40 CFR Part 60, Subpart A	60A-1	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18. Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type = Steam-assisted Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)	
GRP-FLARE	40 CFR Part 63, Subpart A	63A-1	Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8). Flare Assist Type = Steam assisted Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)	
GRP-FUGDDD	40 CFR Part 60, Subpart DDD	60DDD-1	MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE CONTINUOUS PROCESS [NSPS DDD] = THE AFFECTED FACILITY IS A CONTINUOUS PROCESS 40 CFR 60 (NSPS) SUBPART DDD CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = ON/BEFORE SEPTEMBER 30, 1987	
GRP-FUGDDD	40 CFR Part 63, Subpart FFFF	63FFFF-1	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.	
GRP-CTOWER	40 CFR Part 63, Subpart FFFF	63FFFF-3	Monitoring = The cooling water is being monitored for the presence of HAPs or other representative substances that would indicate a leak.	
GRP-CTOWER	40 CFR Part 63, Subpart Q	63Q-1	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.	
GRP-WATER	30 TAC Chapter 115, Water Separation	R5131-1	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Any single or multiple compartment VOC water separator which separates less than 200 gallons (757 liters) a day of materials containing VOC obtained from any equipment.	
GRP-115BLR	30 TAC Chapter 115, Vent Gas Controls	R5121-7	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Boiler in which the vent gas stream is burned at a temperature of at least 1300 degrees F (704 degrees C). Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.	
GRP-115FLR	30 TAC Chapter 115, Vent Gas Controls	R5121-1	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.	
GRP-3FPSV	30 TAC Chapter 115, Vent Gas Controls	R5121-1	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.	
GRP-3FVENT	30 TAC Chapter 115, Vent Gas Controls	R5121-1	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.	
GRP3HBL431	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. VOC Concentration = VOC concentration is less than 30,000 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
GRP3HF456	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP3HTB451	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-ATM2	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-ATM3	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-BVENT	30 TAC Chapter 115, Vent Gas Controls	R5121-2	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.	
GRP-FVENT	30 TAC Chapter 115, Vent Gas Controls	R5121-1	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.	
GRP-HBL431	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-HF415	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-HF454	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-HF456	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-HST101	30 TAC Chapter 115, Vent Gas Controls	R5121-3	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.	
GRP-HT441	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-HTB451	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-HV124	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-HV125	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
GRP-HX411	30 TAC Chapter 115, Vent Gas Controls	R5121-4	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Control Device Type = Carbon adsorption system that replaces the carbon at a predetermined time interval. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.	
LOADPP	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
MSSLOADPP	30 TAC Chapter 115, Vent Gas Controls	R5121-5	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.	
PRO-MONVNTCB	40 CFR Part 63, Subpart FFFF	63FFFF-VNT02	Designated Grp1 = The emission stream is designated as Group 1. Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet 98% reduction per § 63.2455(a) - Table 1.1.a.i. Hal Device Type = No halogen scrubber or other halogen reduction device is used. Meets 63.988(b)(2) = The control device meets criteria in § 63.985(b)(2). Small Device = A small control device (defined in § 63.2550) is not being used. Designated Hal = The emission stream is not designated as halogenated. Prior Eval = The data from a prior evaluation or assessment is used. Determined Hal = The emission stream is determined to be non-halogenated. Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = No bypass lines. CEMS = A CEMS is not used.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			SS Device Type = Boiler or process heater with a design heat input capacity equal to or greater than 44 megawatts (MW) or in which all vent streams are introduced with the primary fuel or are used as the primary fuel.	
PRO-MONVNTCB	40 CFR Part 63, Subpart FFFF	63FFFF-VNT03	Designated Grp1 = The emission stream is designated as Group 1. Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet 98% reduction per § 63.2455(a) - Table 1.1.a.i. Hal Device Type = No halogen scrubber or other halogen reduction device is used. Meets 63.988(b)(2) = The control device does not meet the criteria in § 63.985(b)(2). Small Device = A small control device (defined in § 63.2550) is not being used. Designated Hal = The emission stream is not designated as halogenated. Prior Eval = The data from a prior evaluation or assessment is used. Determined Hal = The emission stream is determined to be non-halogenated. Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have been approved by the Administrator. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = No bypass lines. SS Device Type = Boiler or process heater with a design heat input capacity of less than 44 MW and the vent stream is not introduced as or with the primary fuel.	Alternative monitoring approved by EPA. Deleted Monitoring/Testing § 63.988(c) § 63.988(c)(3) Deleted Recordkeeping [G]§ 63.998(b)(3)
PRO-MONVNTCC	40 CFR Part 63, Subpart FFFF	63FFFF-VNT04	Designated Grp1 = The emission stream is designated as Group 1. Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet a ppmv standard per § 63.2455(a) - Table 1.1.a.i. Hal Device Type = No halogen scrubber or other halogen reduction device is used. Small Device = A small control device (defined in § 63.2550) is being used. 1257A1 = No design evaluation as specified in § 63.1257(a)(1) is being conducted. Designated Hal = The emission stream is not designated as halogenated. Prior Eval = The data from a prior evaluation or assessment is used. 1257A1 Device Type = Carbon adsorber that does not regenerate the carbon bed onsite. Determined Hal = The emission stream is determined to be non-halogenated. Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = No bypass lines. CEMS = A CEMS is not used. SS Device Type = Carbon Adsorber.	
PRO-MONVNTCF	40 CFR Part 63, Subpart FFFF	63FFFF-VNT01	Designated Grp1 = The emission stream is designated as Group 1.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control. Designated Hal = The emission stream is not designated as halogenated. Small Device = A small control device (defined in § 63.2550) is not being used. Determined Hal = The emission stream is determined to be non-halogenated. Prior Eval = The data from a prior evaluation or assessment is used. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = No bypass lines. SS Device Type = Combustion device other than an incinerator, boiler or process heater.	
PRO-NOTDDD	40 CFR Part 60, Subpart DDD	60DDD-6	Manufactured Product = Polypropylene or polyethylene. Continuous Process = The affected facility process is continuous. Construction/Modification Date = On or before September 30, 1987.	
PRO-MONVNTB2	40 CFR Part 63, Subpart FFFF	63FFFF-B1	>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr. Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less. Startup 2003 = The affected source startup was before November 10, 2003. Other Operations = The MCPU includes operations other than those listed in § 63.2435(c). Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63. 63.100 CMPU = The MCPU is not a CMPU defined in § 63.100. New Source = The MCPU is an existing affected source. PUG = The MCPU is not part of a process unit group (PUG). G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. Startup 2002 = The affected source initial startup was before April 4, 2002. PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7. Batch Process Vents = The source includes batch process vents.	Process does not use a CMS Deleted Reporting [G]§ 63.2520(e)(5)(iii)
PRO-MONVNTCB	40 CFR Part 63, Subpart FFFF	63FFFF-C2	>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr. Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less. Startup 2003 = The affected source startup was before November 10, 2003.	Process does not use a CMS Deleted Reporting [G]§ 63.2520(e)(5)(iii)

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Other Operations = The MCPU includes operations other than those listed in § 63.2435(c). Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63. 63.100 CMPU = The MCPU is not a CMPU defined in § 63.100. New Source = The MCPU is an existing affected source. PUG = The MCPU is not part of a process unit group (PUG). G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. Startup 2002 = The affected source initial startup was before April 4, 2002. PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7. Batch Process Vents = The source does not include batch process vents.	
PRO-MONVNTCF	40 CFR Part 63, Subpart FFFF	63FFFF-C1	>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr. Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less. Startup 2003 = The affected source startup was before November 10, 2003. Other Operations = The MCPU includes operations other than those listed in § 63.2435(c). Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63. 63.100 CMPU = The MCPU is not a CMPU defined in § 63.100. New Source = The MCPU is an existing affected source. PUG = The MCPU is not part of a process unit group (PUG). G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. Startup 2002 = The affected source initial startup was before April 4, 2002. PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7. Batch Process Vents = The source does not include batch process vents.	Process does not use a CMS Deleted Reporting [G]§ 63.2520(e)(5)(iii)
PRO-MONVNTE	40 CFR Part 63, Subpart FFFF	63FFFF-E1	>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr. Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less. Startup 2003 = The affected source startup was before November 10, 2003. Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).	Process does not use a CMS Deleted Reporting [G]§ 63.2520(e)(5)(iii)

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63. 63.100 CMPU = The MCPU is not a CMPU defined in § 63.100. New Source = The MCPU is an existing affected source. PUG = The MCPU is not part of a process unit group (PUG). G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. Startup 2002 = The affected source initial startup was before April 4, 2002. PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7. Batch Process Vents = The source includes batch process vents.	

* - The “unit attributes” or operating conditions that determine what requirements apply
** - Notes changes made to the automated results from the DSS, and a brief explanation why

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the “as applicable” language. The “as applicable” language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

New Source Review Authorization References

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX1206	Issuance Date: 08/03/2017
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 18836	Issuance Date: 08/03/2017
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.393	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 03/14/1997
Number: 106.451	Version No./Date: 03/14/1997
Number: 106.452	Version No./Date: 03/14/1997

New Source Review Authorization References

Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 03/14/1997
Number: 106.512	Version No./Date: 06/13/2001
Number: 106.532	Version No./Date: 09/04/2000
Number: 118	Version No./Date: 08/30/1988

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: GRP-BOILER	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 112, Sulfur Compounds	SOP Index No.: REG2-1
Pollutant: SO_2	Main Standard: § 112.9(a)
Monitoring Information	
Indicator: Sulfur Content of Fuel	
Minimum Frequency: Quarterly and within 24 hours of any fuel change	
Averaging Period: n/a	
Deviation Limit: Deviation occurs when Fuel Sulfur Content > 0.8% Sulfur	
Basis of monitoring: A common way to determine SO2 emissions is by determining the amount (percentage) of sulfur in fuel combusted by an emission unit. This quantity along with stack flow rate and quantity of fuel combusted may be used to calculate the amount of SO2 emitted to the atmosphere.	

Unit/Group/Process Information	
ID No.: HT-801	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-4
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: Deviation occurs if repairs to the fill pipe are not completed prior to refilling the storage vessel.	
Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources.	

Unit/Group/Process Information	
ID No.: HT-801	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-4
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Liquid Level	
Minimum Frequency: Once per day	
Averaging Period: n/a	
Deviation Limit: Deviation occurs when the liquid level falls below the bottom of the open end of the fill pipe.	
Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources.	

Unit/Group/Process Information	
ID No.: V-795	
Control Device ID No.: GRP-FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-5
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: No pilot flame.	
Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (https://www.tceq.texas.gov/goto/cfr-online). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Historical Standard Exemption lists may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on March 27, 2019.
   Site rating: 0.07 / High Company rating: 4.42 / Satisfactory
   (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. Has the permit changed on the basis of the compliance history or site/company rating?.....No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?.....No
2. Is a compliance plan and schedule included in the permit? .....No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes